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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

AUG 15 1995

Controlled Release Technologies, Inc
18167 US Highway 19 North Suite 270
Clearwater, FL 34624

Attention: Olivia Laird, Agent
Lynn Burkhardt, Jr. President/Owner

Subject: Panguard HC
EPA Registration No. 59682-1
Your Submission Dated April 27, 1995

The Agency has completed its review of the submission submitted above and the review comments are outlined below.

1. Confidential Statement of Formula: This form is incorrectly filled out. Submit a revised CSF for our review which incorporates the following revisions.

- a. Block # 15 must be filled in for all ingredients.
- b. The two quaternaries must not be separated. Enter onto the CSF only the BTC 2125M. NOTE: The instructions in Block # 10 state: "...List as actually introduced into the formulation..." The quats are not added separately. They are added together at the same time.
- c. Delete the confusing reference "...biocidal solution composed of BTC 2125 M & Standamid KD..."
- d. The certified limits for BTC 2121M would be 33.6% and 30.4 respectively. (upper and lower limits: Blocks 14a & 14b).
- e. Just a reminder to redate and resign the CSF which incorporates the above revisions.

2. The polymer information has been added to the file.

3. The information submitted in reference to the fragrance is acceptable and will be permitted to be used in this formulation at this time.

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

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- 2 -

4. The final labels submitted in response to the Registration Notice are unacceptable. A cursory review of these labels indicates that none of the label revisions requested in the Registratrion Notice were included in the submitted final labels. It is your responsibility to submit final labels which reflect all the revisions as outlined in the Registration Notice. A marked copy of the submitted label is enclosed for your review.

5. The amendment (product name change), submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, is acceptable provided that you make the following labeling changes below before you release the product for shipment bearing the amended labeling.

a. The container disposal heading and the appropriate container statments must be declared on the label.

b. Delete only the word: "the" which appears in the heading: KEEP OUT OF REACH OF CHILDREN.

c. Revise "...Wash thoroughly with soapy water after handling..." to read: Wash thoroughly with soap and water after handling.

d. Delete the words: "Professional" and "trained service personnel".

NOTE: These words will be confused with required statements for restricted use pesticides which permit sale to and use only by certified applicators. Because of the risks posed by restricted use pesticides, the agency believes it is important that the distinction between restricted use and unrestricted pesticides remains always clear to retailers, purchasers and applicators.

6. Our records have been adjusted to reflect your product name change:

OLD PRODUCT NAME: Panguard HC

NEW PRODUCT NAME: Microguard HC

7. A stamped copy of the labeling is enclosed for your records.

If you have any questions concerning this letter, contact V. Goncarovs at 703-305-6663.

Sincerely,

Marion Johnson
Product Manager (31)

Microbial Program Branch
Registration Division (H75050)

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